

V1

Bryan, Kathleen 03-22-2019

Our Designations 00:17:03

Their Counters 00:11:00

Total Time 00:28:03



Page/Line	Source	ID
9:9 - 9:13	Bryan, Kathleen 03-22-2019 (00:00:09) 9:9 KATHLEEN M. BRYAN 9:10 having been first duly sworn, was 9:11 examined and testified as follows: 9:12 9:13 EXAMINATION	K Bryan Combined.95
9:17 - 9:19	Bryan, Kathleen 03-22-2019 (00:00:04) 9:17 Q. Would you please state your full name 9:18 for the record? 9:19 A. Kathleen Mary Bryan.	K Bryan Combined.2
33:10 - 33:14	Bryan, Kathleen 03-22-2019 (00:00:11) 33:10 Q. And you were employed at CRC Public 33:11 Relations from April 2016 to June 2018, correct? 33:12 A. That is correct. 33:13 Q. Your position was senior account 33:14 executive, correct?	K Bryan Combined.48
33:15 - 33:19	Bryan, Kathleen 03-22-2019 (00:00:24) 33:15 A. That is correct. 33:16 Q. At CRC Public Relations from April 2016 33:17 to June 2018, did you do any work involving 33:18 Planned Parenthood? 33:19 A. Yes.	K Bryan Combined.91
34:13 - 34:15	Bryan, Kathleen 03-22-2019 (00:00:09) 34:13 Q. What was the work that you did at CRC 34:14 Public Relations from April 2016 to June 2018 34:15 that involved Planned Parenthood?	K Bryan Combined.49
35:13 - 35:15	Bryan, Kathleen 03-22-2019 (00:00:09) 35:13 The same work, working in public 35:14 relations, writing press releases, pitching op 35:15 eds, pitching people to media.	K Bryan Combined.50
40:1 - 40:3	Bryan, Kathleen 03-22-2019 (00:00:08) 40:1 Q. What were the projects that you worked 40:2 on at CRC Public Relations from April 2016 to 40:3 June 2018 that involved Planned Parenthood?	K Bryan Combined.51
41:6 - 41:8	Bryan, Kathleen 03-22-2019 (00:00:18) 41:6 THE WITNESS: The Center for Medical 41:7 Progress and March For Life, Knights of Columbus, 41:8 those are my main clients at CRC.	K Bryan Combined.52
46:23 - 47:1	Bryan, Kathleen 03-22-2019 (00:00:08) 46:23 Q. And you were communications director at	K Bryan Combined.53

46:24 Live Action from December 2011 to August 2013,
46:25 correct?

47:1 A. That is correct.

69:20 - 69:23

Bryan, Kathleen 03-22-2019 (00:00:10)

K Bryan Combined.54

69:20 Q. For the press releases that you worked
69:21 on at CRC Public Relations related to CMP, where
69:22 did you get your information for the press
69:23 releases?

69:25 - 70:1

Bryan, Kathleen 03-22-2019 (00:00:04)

K Bryan Combined.55

69:25 THE WITNESS: It depends on the press
70:1 release but probably David Daleiden.

85:7 - 85:8

Bryan, Kathleen 03-22-2019 (00:00:03)

K Bryan Combined.56

85:7 Q. What are your views on doctors who
85:8 perform abortions?

85:9 - 85:10

Bryan, Kathleen 03-22-2019 (00:00:04)

K Bryan Combined.92

85:9 A. I believe that they are murdering
85:10 innocent human beings.

96:18 - 96:24

Bryan, Kathleen 03-22-2019 (00:00:20)

K Bryan Combined.3

96:18 Q. You know David Daleiden, right?

96:19 A. I do.

96:20 Q. When did you first meet him?

96:21 A. I met David in December of 2011.

96:22 Q. Where did you meet him?

96:23 A. In the Live Action office in San Jose,
96:24 California.

97:24 - 98:1

Bryan, Kathleen 03-22-2019 (00:00:06)

K Bryan Combined.4

97:24 Q. Was Mr. Daleiden the one who approached
97:25 you about the CMP project that is the subject of
98:1 this lawsuit?

98:3 - 98:6

Bryan, Kathleen 03-22-2019 (00:00:18)

K Bryan Combined.5

98:3 THE WITNESS: Yes.

98:4 BY MR. HUYNH:

98:5 Q. When did he approach you?

98:6 A. May of 2015.

98:7 - 98:7

Bryan, Kathleen 03-22-2019 (00:00:01)

K Bryan Combined.57

98:7 Q. How did he approach you?

98:9 - 98:12

Bryan, Kathleen 03-22-2019 (00:00:03)

K Bryan Combined.58

98:9 THE WITNESS: We were at a wedding
98:10 together, a friend's wedding.

98:11 BY MR. HUYNH:

Page/Line	Source	ID
98:15 - 98:15	98:12 Q. Whose wedding was that? Bryan, Kathleen 03-22-2019 (00:00:04)	K Bryan Combined.59
98:17 - 98:23	98:15 THE WITNESS: Anna Davin. Bryan, Kathleen 03-22-2019 (00:00:26)	K Bryan Combined.6
99:16 - 100:1	98:17 Q. What did he tell you during that 98:18 wedding about the CMP project that is the subject 98:19 of this lawsuit? 98:20 A. He told me that he had already 98:21 completed a two and a half year investigation 98:22 into Planned Parenthood and their involvement in 98:23 the harvesting and selling of baby body parts. Bryan, Kathleen 03-22-2019 (00:00:54)	K Bryan Combined.7
100:8 - 100:10	99:16 Q. Did you tell him that you wanted to 99:17 participate in CMP's project? 99:18 A. I don't remember exactly but I probably 99:19 said that I would help on a press level. 99:20 Q. And what did you mean when you said you 99:21 would help on a press level? 99:22 A. When he was releasing his videos, and 99:23 at that stage I didn't know exactly what were in 99:24 the videos but I knew that it was an 99:25 investigation. When those became public I would 100:1 circulate them to reporters that I knew. Bryan, Kathleen 03-22-2019 (00:00:09)	K Bryan Combined.60
100:11 - 100:15	100:8 Q. Was he asking you for help on a press 100:9 level in your individual capacity? 100:10 A. Yes. We are friends. Bryan, Kathleen 03-22-2019 (00:00:14)	K Bryan Combined.61
101:25 - 102:2	100:11 Q. When Mr. Daleiden told you that he had 100:12 conducted a two and a half year investigation 100:13 into Planned Parenthood, did you ask for a copy 100:14 of that investigation? 100:15 A. I did not. Bryan, Kathleen 03-22-2019 (00:00:09)	K Bryan Combined.8
102:4 - 102:5	101:25 Q. So after this initial conversation with 102:1 Mr. Daleiden in May 2015, when did you become 102:2 involved with CMP? Bryan, Kathleen 03-22-2019 (00:00:04) 102:4 THE WITNESS: Probably July 2015 when 102:5 the videos were coming out.	K Bryan Combined.9

Page/Line	Source	ID
105:7 - 105:21	Bryan, Kathleen 03-22-2019 (00:00:58) 105:7 Q. And how many hours per week did you 105:8 spend in circulating press releases and things 105:9 for CMP? 105:10 A. Not that much, only a few hours a week. 105:11 As a clarification, probably the 105:12 majority of my work in a volunteer capacity was 105:13 booking media for David, so just scheduling 105:14 pretty much. 105:15 Q. So for how long were you booking media 105:16 for Mr. Daleiden? 105:17 A. I don't recall but maybe a couple of 105:18 hours a week. 105:19 Q. I meant from what date to what date? 105:20 A. July 2015 until when I ended up at CRC, 105:21 April 2016.	K Bryan Combined.62
106:6 - 106:13	Bryan, Kathleen 03-22-2019 (00:00:23) 106:6 Q. Besides booking media appearances for 106:7 Mr. Daleiden and CMP, what else did your role 106:8 involve? 106:9 A. That's pretty much it. 106:10 Q. Besides Mr. Daleiden, did you book 106:11 media appearances for any of the other defendants 106:12 in this case? 106:13 A. No, not that I recall.	K Bryan Combined.10
106:14 - 106:16	Bryan, Kathleen 03-22-2019 (00:00:05) 106:14 MR. HUYNH: Let's mark this as 106:15 Exhibit 93. 106:16 THE WITNESS: (Perusing.)	K Bryan Combined.11 93.1.1
106:17 - 106:25	Bryan, Kathleen 03-22-2019 (00:00:15) 106:17 (Bryan Exhibit 93, Document Bates 106:18 Stamped CM 21359 to CM 21362, was 106:19 marked for identification.) 106:20 MR. HUYNH: So Exhibit 39 is Bates 106:21 stamped CM 21359 to CM 21362. 106:22 BY MR. HUYNH: 106:23 Q. This is a July 15, 2015 e-mail chain 106:24 between you and Mr. Daleiden, correct? 106:25 A. Correct.	K Bryan Combined.93
108:5 - 108:9	Bryan, Kathleen 03-22-2019 (00:00:16)	clear K Bryan Combined.63

Page/Line	Source	ID
108:5	Q. Do you have a rough estimate of how	
108:6	many media organizations that you pitched?	
108:7	A. I don't.	
108:8	Q. Was it above 100?	
108:9	A. I would be guessing but probably 100.	
110:23 - 111:4	Bryan, Kathleen 03-22-2019 (00:00:16)	K Bryan Combined.12
110:23	Q. Going to the bottom of the page Bates	93.2.1
110:24	stamped CM 21360, Mr. Newman e-mailed you back	
110:25	and asked, "Who are your spokespersons when David	
111:1	is busy?"	
111:2	Do you see that?	
111:3	A. I see that.	
111:4	Q. Does "our" refer to CMP?	
111:8 - 111:9	Bryan, Kathleen 03-22-2019 (00:00:04)	K Bryan Combined.13
111:8	THE WITNESS: When I received that	clear
111:9	e-mail that's how I took it, is that it was CMP.	
111:16 - 111:25	Bryan, Kathleen 03-22-2019 (00:00:35)	K Bryan Combined.14
111:16	Q. In the e-mail above that you wrote to	93.2.2
111:17	Mr. Newman and said, "I've been pitching David	
111:18	and he's been able to do all of the media I've	
111:19	gotten so far. I guess we'll cross that bridge	
111:20	when we get to it."	
111:21	Do you see that?	
111:22	A. I see that.	
111:23	Q. You forwarded the e-mails we just	clear
111:24	looked at to David Daleiden, Anna Davin and	
111:25	Ashley Baldwin, correct?	
112:2 - 112:20	Bryan, Kathleen 03-22-2019 (00:00:43)	K Bryan Combined.15
112:2	THE WITNESS: That is correct.	
112:3	BY MR. HUYNH:	
112:4	Q. After you forwarded the e-mails to	
112:5	Ms. Davin, she e-mailed you to say, "Don't let	93.2.3
112:6	him step into that. Just my smiley opinion."	
112:7	Do you see that?	
112:8	A. I see that.	
112:9	Q. "Him" in this even refers to	
112:10	Mr. Newman, correct?	
112:11	A. That's how I took it at the time.	
112:12	Q. In the e-mail directly above that you	93.2.4
112:13	responded to Ms. Davin by saying, "I'm not, LOL.	

Page/Line	Source	ID
113:8 - 113:10	<p>112:14 Don't worry. I love Troy and all of the pro-life 112:15 leaders involved in this. But David, I am only 112:16 doing this for you. I am not anyone else's comms 112:17 person and will not pitch anyone else." 112:18 You did not want Mr. Newman to be a 112:19 spokesperson for CMP, correct? 112:20 A. That's not what this e-mail says.</p> <p>Bryan, Kathleen 03-22-2019 (00:00:05)</p> <p>113:8 In this e-mail you wrote to 113:9 Mr. Daleiden that, "This is your project and you 113:10 need to do the media for it," correct?</p>	<p>K Bryan Combined.16</p> <p>93.2.7</p>
113:16 - 114:9	<p>Bryan, Kathleen 03-22-2019 (00:01:00)</p> <p>113:16 Q. And it's the e-mail that is timed at 113:17 9:13 a.m. 113:18 Do you see that? 113:19 A. I see that. 113:20 Q. You believe the project that is the 113:21 subject of this lawsuit is Mr. Daleiden's 113:22 project, correct? 113:23 A. Correct. 113:24 Q. Why do you hold that belief? 113:25 A. Because he's the founder of CMP and the 114:1 lead investigator. 114:2 Q. Looking at the next e-mail at 9:22 a.m. 114:3 on top of the page Bates stamped CM 21360 you 114:4 wrote to Mr. Daleiden, "Have you done any radio 114:5 and TV yet? Also, is The Today Show still at 114:6 play? A friend in PR and I are working on some 114:7 staff for Ya Bro. Keep me in the loop." 114:8 Do you see that? 114:9 A. I see that.</p>	<p>K Bryan Combined.47</p> <p>clear</p> <p>93.2.6</p> <p>clear</p>
130:20 - 130:22	<p>Bryan, Kathleen 03-22-2019 (00:00:14)</p> <p>130:20 Q. Was one of the CMP's goals to defund 130:21 Planned Parenthood? 130:22 A. To my understanding, yes.</p>	<p>K Bryan Combined.64</p>
131:24 - 132:10	<p>Bryan, Kathleen 03-22-2019 (00:00:22)</p> <p>131:24 Q. And would you describe the other board 131:25 members of CMP in the same way as you have 132:1 described Mr. Daleiden? 132:2 A. I don't know them that well, to be</p>	<p>K Bryan Combined.17</p>

Page/Line	Source	ID
	132:3 honest.	
	132:4 Q. So you don't know Mr. Newman that well?	
	132:5 A. I don't.	
	132:6 Q. You don't know Mr. Rhomberg that well?	
	132:7 A. I do not.	
	132:8 Q. You know Mr. Daleiden the best out of	
	132:9 the people involved with CMP?	
	132:10 A. Yes.	
133:10 - 133:13	Bryan, Kathleen 03-22-2019 (00:00:09)	K Bryan Combined.18
	133:10 Q. Sure. Based on your testimony so far,	
	133:11 would you say that you were involved in CMP's	
	133:12 media strategy in relation to the undercover	
	133:13 videos?	
133:15 - 133:24	Bryan, Kathleen 03-22-2019 (00:00:26)	K Bryan Combined.19
	133:15 THE WITNESS: Yes.	
	133:16 BY MR. HUYNH:	
	133:17 Q. What was your role in terms of CMP's	
	133:18 media strategy?	
	133:19 A. It would have been small. I really	
	133:20 wasn't that involved in it but offering my	
	133:21 opinion, my thoughts.	
	133:22 Q. What opinions or thoughts did you offer	
	133:23 to Mr. Daleiden or CMP regarding CMP's undercover	
	133:24 videos?	
134:1 - 134:4	Bryan, Kathleen 03-22-2019 (00:00:05)	K Bryan Combined.20
	134:1 THE WITNESS: I don't recall.	
	134:2 BY MR. HUYNH:	
	134:3 Q. Who else was involved with CMP's media	
	134:4 strategy?	
134:6 - 134:8	Bryan, Kathleen 03-22-2019 (00:00:05)	K Bryan Combined.21
	134:6 THE WITNESS: CRC Public Relations.	
	134:7 BY MR. HUYNH:	
	134:8 Q. Anyone else?	
134:10 - 134:14	Bryan, Kathleen 03-22-2019 (00:00:12)	K Bryan Combined.22
	134:10 THE WITNESS: David Daleiden.	
	134:11 BY MR. HUYNH:	
	134:12 Q. Anyone else besides CRC Public	
	134:13 Relations and Mr. Daleiden that was involved in	
	134:14 CMP's media strategy?	
134:16 - 134:16	Bryan, Kathleen 03-22-2019 (00:00:02)	K Bryan Combined.23

Page/Line	Source	ID
135:15 - 135:17	<p>134:16 THE WITNESS: Not that I recall.</p> <p>Bryan, Kathleen 03-22-2019 (00:00:06)</p> <p>135:15 Q. Did you write any of the initial drafts</p> <p>135:16 of CMP's press releases relating to its</p> <p>135:17 undercover videos?</p>	K Bryan Combined.65
135:19 - 135:19	<p>Bryan, Kathleen 03-22-2019 (00:00:03)</p> <p>135:19 THE WITNESS: Not that I recall.</p>	K Bryan Combined.66
138:3 - 138:9	<p>Bryan, Kathleen 03-22-2019 (00:00:21)</p> <p>138:3 Q. How many calls did you place to media</p> <p>138:4 organizations regarding CRC's undercover videos?</p> <p>138:5 A. I don't know.</p> <p>138:6 Q. More than 50?</p> <p>138:7 A. Probably.</p> <p>138:8 Q. More than 100?</p> <p>138:9 A. No.</p>	K Bryan Combined.67
138:18 - 138:20	<p>Bryan, Kathleen 03-22-2019 (00:00:09)</p> <p>138:18 Q. We know it's more than 50 but not more</p> <p>138:19 than 100 and I asked you if it was more than 75.</p> <p>138:20 A. I'd say it was probably about 100.</p>	K Bryan Combined.68
140:15 - 140:17	<p>Bryan, Kathleen 03-22-2019 (00:00:15)</p> <p>140:15 MR. HUYNH: Let's mark this as</p> <p>140:16 Exhibit 96. This document is Bates stamped CM</p> <p>140:17 03856 to CM 03874.</p>	K Bryan Combined.24
140:18 - 141:21	<p>Bryan, Kathleen 03-22-2019 (00:01:10)</p> <p>140:18 THE WITNESS: (Perusing.)</p> <p>140:19 (Bryan Exhibit 96, Document Bates</p> <p>140:20 Stamped CM 03856 to CM 03874, was</p> <p>140:21 marked for identification.)</p> <p>140:22 BY MR. HUYNH:</p> <p>140:23 Q. Ms. Bryan, this is a July 13, 2015</p> <p>140:24 e-mail from Mr. Daleiden to you and others,</p> <p>140:25 correct?</p> <p>141:1 A. Correct.</p> <p>141:2 Q. In the fourth paragraph of this e-mail</p> <p>141:3 Mr. Daleiden writes, "Please find attached CMP's</p> <p>141:4 messaging guidelines for internal circulation</p> <p>141:5 only, our press kit and several fact sheets</p> <p>141:6 bring you up to speed on various subtopics within</p> <p>141:7 fetal trafficking. Be mindful, however, to keep</p> <p>141:8 the focus strictly on Planned Parenthood. Our</p>	K Bryan Combined.94

141:9 press release is pasted below and our website
 141:10 will be live on www.centerformedicalprogress.org
 141:11 in six hours."
 141:12 Do you see that?
 141:13 A. I do.
 141:14 Q. Who drafted this media kit that
 141:15 Mr. Daleiden attached?
 141:16 A. I don't know.
 141:17 Q. Did you help prepare this media kit for
 141:18 Mr. Daleiden?
 141:19 A. Not that I recall.
 141:20 Q. Did you communicate to the media about
 141:21 information from this media kit?

141:24 - 142:4

Bryan, Kathleen 03-22-2019 (00:00:06)

K Bryan Combined.25

141:24 THE WITNESS: Can you repeat the
 141:25 question?
 142:1 BY MR. HUYNH:
 142:2 Q. Yes.

142:3 Did you communicate to the media about
 142:4 information from this media kit?

142:6 - 142:19

Bryan, Kathleen 03-22-2019 (00:00:42)

K Bryan Combined.26

142:6 THE WITNESS: Yes.
 142:7 BY MR. HUYNH:
 142:8 Q. Did you verify that any of this
 142:9 information was accurate before you communicated
 142:10 it to the media?
 142:11 A. Any information that I conveyed to the
 142:12 media I would have checked to make sure that it
 142:13 was accurate.
 142:14 Q. How did you check that it was accurate?
 142:15 A. By watching the full footage of the
 142:16 investigative videos that were released.
 142:17 Q. So you watched all the raw footage that
 142:18 CMP took for the project at issue in this
 142:19 lawsuit?

142:21 - 143:12

Bryan, Kathleen 03-22-2019 (00:00:40)

K Bryan Combined.27

142:21 THE WITNESS: CMP released the full
 142:22 footage of all their videos that they released on
 142:23 their website. So yes, I would have.
 142:24 BY MR. HUYNH:

142:25 Q. You watched all of it?

143:1 A. I watched all of it that was released

143:2 publicly on CMP's website.

143:3 Q. Did that include the raw footage? Let

143:4 me rephrase that. Sorry.

143:5 Did that include the unedited footage?

143:6 A. Of the videos that were released?

143:7 Q. Yes.

143:8 A. Yes. CMP, every video that they

143:9 released, they released the full, unedited

143:10 footage.

143:11 Q. And so did you watch the full, unedited

143:12 footage for every video?

143:17 - 143:23

Bryan, Kathleen 03-22-2019 (00:00:14)

K Bryan Combined.28

143:17 THE WITNESS: Every video on the

143:18 website, yes, I would have watched the full

143:19 footage.

143:20 BY MR. HUYNH:

143:21 Q. Let me backtrack a little bit.

143:22 So on the website, did CMP post the

143:23 full, unedited versions of the videos?

143:25 - 144:11

Bryan, Kathleen 03-22-2019 (00:00:30)

K Bryan Combined.29

143:25 THE WITNESS: Every video that CMP

144:1 released publicly, all of their edited versions,

144:2 they additionally released the full footage of

144:3 those videos.

144:4 So yes, I would have watched those

144:5 videos.

144:6 BY MR. HUYNH:

144:7 Q. Let me just try to make sure I

144:8 understand your answers.

144:9 So you would have watched the full

144:10 footage of the videos that CMP released?

144:11 A. Yes.

147:9 - 147:13

Bryan, Kathleen 03-22-2019 (00:00:21)

K Bryan Combined.69

147:9 Q. You said you don't know if you watched

147:10 over 500 hours of the raw video footage.

147:11 Do you have an estimate of how many

147:12 hours you watched?

147:13 A. I don't recall.

149:11 - 150:4

Bryan, Kathleen 03-22-2019 (00:01:05)

K Bryan Combined.70

149:11 Q. This is a July 2015 e-mail chain
 149:12 between you and Mr. Daleiden, correct?
 149:13 A. Correct.
 149:14 Q. In the July 6, 2015 e-mail at the top
 149:15 of the chain, Mr. Daleiden attaches a PDF
 149:16 entitled "Messaging Guidelines FT," right?
 149:17 A. That is correct.
 149:18 Q. Mr. Daleiden writes to you in the
 149:19 e-mail, "Here is a draft messaging guide for
 149:20 other pro-life groups. Thoughts, please."
 149:21 Do you see that?
 149:22 A. I see that.
 149:23 Q. Mr. Daleiden asked you for your
 149:24 thoughts on the document entitled "Messaging
 149:25 Guidelines," correct?
 150:1 A. Correct.
 150:2 Q. These guidelines were for other
 150:3 pro-life groups other than CMP, is that right?
 150:4 A. It looks like that is correct.

155:11 - 155:12

Bryan, Kathleen 03-22-2019 (00:00:06)

K Bryan Combined.30

155:11 Q. What did you tell media organizations
 155:12 about CMP's editing of their undercover videos?

155:14 - 156:14

Bryan, Kathleen 03-22-2019 (00:01:30)

K Bryan Combined.31

155:14 THE WITNESS: I don't remember.
 155:15 BY MR. HUYNH:
 155:16 Q. Did you tell the media that the editing
 155:17 of CMP's undercover videos was not distorted?
 155:18 A. I don't remember but any conversations
 155:19 that I had with the media, they understand the
 155:20 editing process because they do the same thing in
 155:21 their own media editing for news programs. They
 155:22 understand the editing process so I really didn't
 155:23 have to say that much to them.
 155:24 Q. Did you tell media organizations that
 155:25 CMP edited -- strike that.
 156:1 Did you tell media organizations that
 156:2 CMP's undercover videos was not highly edited?
 156:3 A. It's a matter of public record that
 156:4 they were edited but that CMP always released the

Page/Line	Source	ID
	156:5 full footage so I was always very honest about 156:6 that with the media. 156:7 We would suggest that they watch the 156:8 full footage. 156:9 Q. You told the media that they should 156:10 watch the full footage? 156:11 A. In addition to watching the short 156:12 versions as well. 156:13 Q. Did you expect the media to watch the 156:14 full footage?	
156:21 - 157:8	Bryan, Kathleen 03-22-2019 (00:00:30) 156:21 THE WITNESS: My experience with the 156:22 media is they do their due diligence and so many 156:23 of the reporters that I spoke with, they wanted 156:24 to see the full footage and that's why CMP 156:25 released the full footage alongside the shorter 157:1 versions. 157:2 BY MR. HUYNH: 157:3 Q. Which reporters told that you they 157:4 wanted to see the full footage? 157:5 A. I don't recall. 157:6 Q. Do you recall any questions that the 157:7 media had for you when you sent them any 157:8 information about CMP's undercover videos?	K Bryan Combined.32
157:10 - 157:14	Bryan, Kathleen 03-22-2019 (00:00:12) 157:10 THE WITNESS: The only questions that I 157:11 can recall is for more information but everything 157:12 was on the CMP website. So we would always 157:13 suggest that they check out all the documentation 157:14 and additional footage on the CMP website.	K Bryan Combined.33
158:15 - 158:21	Bryan, Kathleen 03-22-2019 (00:00:17) 158:15 Q. Did every media organization that you 158:16 reached out to ask you for the full footage? 158:17 A. Not every one, no. 158:18 Q. So some didn't ask you for the full 158:19 footage; is that correct? 158:20 A. I don't remember but that could be, 158:21 yes.	K Bryan Combined.71
163:6 - 163:10	Bryan, Kathleen 03-22-2019 (00:00:17) 163:6 Q. My question is to your knowledge are	K Bryan Combined.34

Page/Line	Source	ID
163:14 - 163:15	<p>163:7 the people listed here potential donors that</p> <p>163:8 Mr. Daleiden was contacting?</p> <p>163:9 A. To my knowledge and the names that I</p> <p>163:10 recognize on this list, they are media people.</p> <p>Bryan, Kathleen 03-22-2019 (00:00:03)</p> <p>163:14 Q. Do you know how Mr. Daleiden compiled</p> <p>163:15 this list?</p>	K Bryan Combined.35
163:17 - 163:20	<p>Bryan, Kathleen 03-22-2019 (00:00:13)</p> <p>163:17 THE WITNESS: I do not.</p> <p>163:18 BY MR. HUYNH:</p> <p>163:19 Q. Do you know how donors learned about</p> <p>163:20 CMP?</p>	K Bryan Combined.36
163:22 - 163:25	<p>Bryan, Kathleen 03-22-2019 (00:00:11)</p> <p>163:22 THE WITNESS: I do not.</p> <p>163:23 BY MR. HUYNH:</p> <p>163:24 Q. Were e-mails sent to potential donors</p> <p>163:25 by Mr. Daleiden?</p>	K Bryan Combined.37
164:2 - 164:5	<p>Bryan, Kathleen 03-22-2019 (00:00:19)</p> <p>164:2 THE WITNESS: I don't know.</p> <p>164:3 BY MR. HUYNH:</p> <p>164:4 Q. Was information sent to donors via</p> <p>164:5 LISTSERV?</p>	K Bryan Combined.38
164:7 - 164:10	<p>Bryan, Kathleen 03-22-2019 (00:00:10)</p> <p>164:7 THE WITNESS: I don't know.</p> <p>164:8 BY MR. HUYNH:</p> <p>164:9 Q. Did you communicate with any potential</p> <p>164:10 donors?</p>	K Bryan Combined.39
164:12 - 164:13	<p>Bryan, Kathleen 03-22-2019 (00:00:03)</p> <p>164:12 THE WITNESS: Not to my knowledge, not</p> <p>164:13 that I remember.</p>	K Bryan Combined.40
165:2 - 165:18	<p>Bryan, Kathleen 03-22-2019 (00:00:54)</p> <p>165:2 Q. What was your understanding of the</p> <p>165:3 Human Capital Project in July 2015?</p> <p>165:4 A. In July 2015 my understanding was the</p> <p>165:5 same; that the Human Capital Project was an</p> <p>165:6 investigation, an undercover investigation into</p> <p>165:7 the abortion industry.</p> <p>165:8 Q. So your understanding of what the Human</p> <p>165:9 Capital Project was or is has not changed from</p> <p>165:10 July 2015 to the present?</p>	K Bryan Combined.41

Page/Line	Source	ID
	165:11 A. Correct.	
	165:12 Q. Was the Human Capital Project a project	
	165:13 conducted by CMP?	
	165:14 A. As I understand it, yes.	
	165:15 Q. Do you know when the planning for the	
	165:16 Human Capital Project began?	
	165:17 A. I do not.	
	165:18 Q. Whose idea was the project?	
165:20 - 166:5	Bryan, Kathleen 03-22-2019 (00:00:27)	K Bryan Combined.42
	165:20 THE WITNESS: What project?	
	165:21 BY MR. HUYNH:	
	165:22 Q. Let me clarify.	
	165:23 Whose idea was the Human Capital	
	165:24 Project?	
	165:25 A. As I understand it, David Daleiden.	
	166:1 Q. Anyone else?	
	166:2 A. Not to my knowledge.	
	166:3 Q. So to your knowledge Mr. Newman was not	
	166:4 the genesis of the idea for the Human Capital	
	166:5 Project?	
166:16 - 166:18	Bryan, Kathleen 03-22-2019 (00:00:07)	K Bryan Combined.43
	166:16 THE WITNESS: As I understand it and	
	166:17 from what I know, David Daleiden is the genesis	
	166:18 of the Human Capital Project.	
168:9 - 168:11	Bryan, Kathleen 03-22-2019 (00:00:03)	K Bryan Combined.44
	168:9 BY MR. HUYNH:	
	168:10 Q. Why did you get involved with the Human	
	168:11 Capital Project?	
168:14 - 168:20	Bryan, Kathleen 03-22-2019 (00:00:17)	K Bryan Combined.45
	168:14 THE WITNESS: I got involved in the	
	168:15 Human Capital Project because I believed that the	
	168:16 public deserved to know what the Center for	
	168:17 Medical Progress -- the findings that the Center	
	168:18 for Medical Progress had come across and I	
	168:19 believed that the public deserved to know the	
	168:20 truth.	
169:9 - 169:14	Bryan, Kathleen 03-22-2019 (00:00:26)	K Bryan Combined.46
	169:9 Q. And when you say the abortion industry,	
	169:10 that includes Planned Parenthood, correct?	
	169:11 A. That is correct.	

Page/Line	Source	ID
	169:12 Q. So you believed that Planned Parenthood 169:13 was exploiting women? 169:14 A. Yes.	
185:9 - 185:12	Bryan, Kathleen 03-22-2019 (00:00:12) 185:9 Q. CMP actors in its undercover videos 185:10 were telling Planned Parenthood employees that 185:11 Biomax was supplying specimen's to researchers, 185:12 correct?	K Bryan Combined.72
185:14 - 185:14	Bryan, Kathleen 03-22-2019 (00:00:01) 185:14 THE WITNESS: I don't remember.	K Bryan Combined.83
185:25 - 186:2	Bryan, Kathleen 03-22-2019 (00:00:08) 185:25 Q. Most of the people who went undercover 186:1 as Biomax employees for the Human Capital Project 186:2 used fake names, correct?	K Bryan Combined.73
186:4 - 186:11	Bryan, Kathleen 03-22-2019 (00:00:29) 186:4 THE WITNESS: I don't know. 186:5 BY MR. HUYNH: 186:6 Q. So in CMP's videos, did Mr. Daleiden 186:7 use the name Robert Sarkis? 186:8 A. I don't remember. 186:9 Q. In CMP's undercover videos, did Susan 186:10 Merritt use the name Susan Tanenbaum? 186:11 A. I don't remember.	K Bryan Combined.84
186:18 - 187:3	Bryan, Kathleen 03-22-2019 (00:00:33) 186:18 Q. In CMP's video did Brianna Baxter use 186:19 the name Brianna Allen? 186:20 A. I don't know. 186:21 Q. In CMP's videos, did Anna Bettisworth 186:22 use the name Rebecca Wagner? 186:23 A. I don't know. 186:24 Q. You watched CMP's undercover videos, 186:25 right? 187:1 A. Yes. 187:2 Q. Do you remember what name Anna 187:3 Bettisworth used?	K Bryan Combined.74
187:5 - 187:5	Bryan, Kathleen 03-22-2019 (00:00:11) 187:5 THE WITNESS: I don't.	K Bryan Combined.85
192:3 - 192:5	Bryan, Kathleen 03-22-2019 (00:00:05) 192:3 Q. Do you know if CMP employees carried 192:4 concealed video cameras when they went undercover	K Bryan Combined.75

Page/Line	Source	ID
192:7 - 192:12	<p>192:5 at NAF conferences?</p> <p>Bryan, Kathleen 03-22-2019 (00:00:15)</p> <p>192:7 Do you know or have you heard?</p> <p>192:8 THE WITNESS: I don't know.</p> <p>192:9 BY MR. HUYNH:</p> <p>192:10 Q. Do you know if CMP employees carried</p> <p>192:11 concealed video cameras when they went undercover</p> <p>192:12 at Planned Parenthood conferences?</p>	K Bryan Combined.86
192:14 - 192:14	<p>Bryan, Kathleen 03-22-2019 (00:00:00)</p> <p>192:14 THE WITNESS: I don't know.</p>	K Bryan Combined.87
192:16 - 192:18	<p>Bryan, Kathleen 03-22-2019 (00:00:08)</p> <p>192:16 Q. Do you know whether Planned Parenthood</p> <p>192:17 employees who were taped in CMP's undercover</p> <p>192:18 videos provided their consent to be taped?</p>	K Bryan Combined.76
192:20 - 192:20	<p>Bryan, Kathleen 03-22-2019 (00:00:03)</p> <p>192:20 THE WITNESS: I don't know.</p>	K Bryan Combined.88
200:4 - 200:6	<p>Bryan, Kathleen 03-22-2019 (00:00:09)</p> <p>200:4 Q. Sure. Do you have a problem with CMP</p> <p>200:5 actors lying to carry out the Human Capital</p> <p>200:6 Project?</p>	K Bryan Combined.77
200:8 - 200:8	<p>Bryan, Kathleen 03-22-2019 (00:00:08)</p> <p>200:8 THE WITNESS: I don't know.</p>	K Bryan Combined.89
225:25 - 226:15	<p>Bryan, Kathleen 03-22-2019 (00:00:50)</p> <p>225:25 Q. The subject line of your e-mail on July</p> <p>226:1 10, 2015 at 3:47 p.m. is, "Huge undercover</p> <p>226:2 investigation to be released next week. 115 is</p> <p>226:3 invited to preview documents before the national</p> <p>226:4 press."</p> <p>226:5 Do you see that?</p> <p>226:6 A. That's the subject line for the entire</p> <p>226:7 chain. That's not just my e-mail.</p> <p>226:8 Q. Okay, that appears to be the case. The</p> <p>226:9 other e-mails don't have a subject line but I</p> <p>226:10 think we can assume that that's what the subject</p> <p>226:11 line was for the previous e-mails.</p> <p>226:12 A. Yes.</p> <p>226:13 Q. What is 115 that is referred to in the</p> <p>226:14 subject line of this e-mail that we're talking</p> <p>226:15 about?</p>	<p>K Bryan Combined.78</p> <p>103.1.2</p>
226:17 - 226:18	<p>Bryan, Kathleen 03-22-2019 (00:00:05)</p>	K Bryan Combined.90

Page/Line	Source	ID
	226:17 THE WITNESS: It's a coalition of 226:18 pro-life leaders.	clear
226:25 - 227:3	Bryan, Kathleen 03-22-2019 (00:00:22) 226:25 Q. Could you please give me the names that 227:1 you remember? 227:2 A. Troy Newman, David Daleiden, Father 227:3 Frank Pavone, Lila Rose.	K Bryan Combined.79
249:4 - 249:6	Bryan, Kathleen 03-22-2019 (00:00:10) 249:4 MR. HUYNH: Let's mark the next 249:5 document Bates stamped CM 20708 to 17 as 249:6 Exhibit 106.	K Bryan Combined.80 106.1
249:24 - 250:3	Bryan, Kathleen 03-22-2019 (00:00:18) 249:24 Q. You are cc'd at the top of this e-mail 249:25 chain from Mr. Newman, correct? Your name 250:1 appears on the sixth line in the cc. field. 250:2 Do you see that? 250:3 A. Yes.	K Bryan Combined.81 106.1.1
250:18 - 250:25	Bryan, Kathleen 03-22-2019 (00:00:16) 250:18 Q. Mr. Newman wrote in this e-mail that, 250:19 "Yes, this has exceeded our expectations. We are 250:20 off to a great start but let's remember the 250:21 talking points. This is about Planned 250:22 Parenthood, putting them in jail, defunding them, 250:23 taking down their empire." 250:24 Do you see that? 250:25 A. I see that.	K Bryan Combined.82 106.1.2

Our Designations = 00:17:03

Their Counters = 00:11:00

Total Time = 00:28:03

Documents Shown

103

106

93